

Austin & Rogers, P.A.

ATTORNEYS AND COUNSELORS AT LAW

WILLIAM FREDERICK AUSTIN
(1930-2016)

TIMOTHY F. ROGERS
RAYMON E. LARK, JR.
RICHARD L. WHITT
EDWARD L. EUBANKS
W. MICHAEL DUNCAN*

COLUMBIA OFFICE
CONGAREE BUILDING
508 HAMPTON STREET, SUITE 203
POST OFFICE BOX 11716 (29211)
COLUMBIA, SOUTH CAROLINA 29201
TELEPHONE: (803) 256-4000
FACSIMILE: (803) 252-3679
WWW.AUSTINROGERSPA.COM

OF COUNSEL:
JEFFERSON D. GRIFFITH, III

* ALSO ADMITTED IN N.C.

October 31, 2018

VIA, ELECTRONIC FILING

The Honorable Jocelyn Boyd
Chief Clerk and Administrator
The Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, South Carolina 29210

Re: • **Docket 2018-202-E**

Ms. Boyd:

I am writing you on behalf of the South Carolina Solar Business Alliance, Inc., and Ecoplexus, Inc., (“SCSBA/Ecoplexus”). SCSBA/Ecoplexus e-filed correspondence with this Commission on October 29, 2018, in support of the Interstate Renewable Energy Council’s, (“IREC”) Petition to Intervene in this Docket. This correspondence supplements our previous correspondence of October 29, 2018, and relates back to our filing.

SCSBA/Ecoplexus would like to provide clarification regarding its general support for the recommendations made by IREC in this Docket related to cost recovery. SCSBA/Ecoplexus are not recommending that avoided cost payments by Duke Energy Carolinas, LLC and Duke Energy Progress, LLC, (hereinafter together as, “Duke Energy”), for energy and capacity made pursuant to power purchase agreements entered into under CPRE, be treated differently than other power purchase agreements currently under the jurisdiction of this Commission.

However, to the extent that Duke Energy is requesting that this Commission make a public interest finding and/or provide express authorization for the rate-basing of system upgrade costs separate from avoided cost payments for energy and capacity for CPRE projects, the SCSBA/Ecoplexus believe such a determination is not supported by the public record in this Docket and would be inappropriate at this time.

Regards,
AUSTIN & ROGERS, P.A.

/s/Richard L. Whitt,
Richard L. Whitt,
As counsel for Ecoplexus, Inc., and
The South Carolina Solar Business Alliance, Inc.

RLW/cas
cc: All Parties of Record, *via, electronic mail*